



Received & Inspected

NOV 04 2014

FCC Mail Room

COUNTY of McHENRY

McHENRY COUNTY GOVERNMENT CENTER
2200 NORTH SEMINARY AVENUE
WOODSTOCK, IL 60098-2637

Peter B. Austin
County Administrator

October 30, 2014

DOCKET FILE COPY ORIGINAL

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Connect America Phase II - Initial Eligible Areas Map

Dear Sir or Madam:

Please accept this letter in connection with the July 11, 2014 Federal Communications Commission (FCC) Report and Order and Further Notice of Proposed Rulemaking (WC Docket No. 10-90). This Order requests formal proposals to participate in rural broadband experiments that will be funded by the FCC's Connect America Fund. Under this order, the Commission adopted a \$100 million budget for the rural broadband experiments, and established an objective methodology for selecting projects among formal applications, which we estimate will conclude on October 13, 2014.

Prior to the application period closing, McHenry County, Illinois is submitting this letter of objection with respect to the model that was applied to determine area eligibility for submission of bids for the Connect America Fund experiments. We believe the model has been incorrectly applied in McHenry County, and we request that it be fixed so as to permit portions of the County that are underserved by broadband to be eligible for future funding under the \$1.8 billion Connect America Fund competition. McHenry County was not permitted to submit a bid in the experiment because the FCC model did not identify any area of the County as eligible for funding.

The FCC has generated a Connect America Phase II - Initial Eligible Areas Map from the model results. This map identifies the areas that have been initially determined to be eligible for ongoing Phase II Connect America support, which are shown in dark green on the map. The map displays the outputs of the adopted version of the Connect America Cost Model (CAM) (version 4.1.1), which calculates costs per location in all price cap carrier study areas for the entire country. Areas marked as "served" are reported as having Internet access of at least 3 Mbps downstream and 768 kbps upstream from an unsubsidized competitor. The map is based on round 8 State Broadband Initiative Data (data as of June 2013).

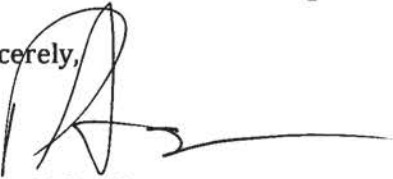
No. of Copies rec'd 0
List ABCDE

According to the FCC, the Wireline Competition Bureau made an initial determination that areas shown as unserved/between cost on the map are eligible for Phase II support, subject to a "challenge process". An area is classified as "between cost" if the average monthly cost-per-location for that census block, as calculated by the cost model, is above \$52.50 but below \$207.81. An area is classified as "unserved" if it is reported to lack service meeting the requisite speed from an unsubsidized competitor. McHenry County, Illinois believes the initial determination is incorrect, and we formally request that the FCC revisit the model calculation for our County.

Recognizing the limited access to internet in the northern and western portions of McHenry County, in 2011 the County contracted with Northern Illinois University to collect data on cost and broadband service in McHenry County. Their findings are that businesses, residents and organizations closer to Wisconsin and in the western half of the County of McHenry are only able to receive bandwidth from satellite, wireless or copper-based landline providers when they are beyond the boundaries of the larger communities. In many areas, data services provided across copper wiring are reported to be adversely affected by heavy rains and storms causing outages. Several large commercial users are currently forced to use multiple-bonded T1 lines augmented by wireless from providers to meet their total needs for bandwidth and redundancy. Fiber optic-based services are slowly creeping towards all centers of population. However, the more rural areas will be limited to dialup or wireless access for some time.

We thank you for your consideration of our request to challenge the accuracy of the Connect America Phase II - Initial Eligible Areas Map, and look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to be "P. Austin", with a long horizontal line extending to the right.

Peter B. Austin
County Administrator

c: Congressman Randy Hultgrean